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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

MOTION FOR LATE ACCEPTANCE OF FILING
OF RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(DBP/USPS-137(a-l) and (p-t))

The United States Postal Service hereby moves that it be permitted to file its responses to the following interrogatories of David Popkin: DBP/USPS-137(a-l) and (p-t), filed on December 17, 2001. The responses were due to have been filed on December 31, 2001. Preparation of the responses to several subparts required several rounds of communication with personnel in the field and the retrieval of detailed *operational minutiae* from the field, the last details of which were transmitted to Headquarters only earlier today. Preparation of still other subparts could not be finalized until the information from the filed was analyzed. Accordingly, the integrated response could not be filed until today. The Postal Service regrets the delay, but considers that it was unavoidable.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel
Ratemaking

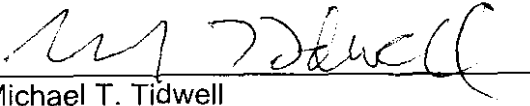


Michael T. Tidwell
Attorney

January 23, 2002

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.


Michael T. Tidwell

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January 23, 2001
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